



CONTRA COSTA  
WATER DISTRICT

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**FACSIMILE TRANSMISSION COVER SHEET**

**TO:** Debbie Irvin Fax: (916) 341-5252

**CC:** Gita Kapahi (USBR) Fax: (916) 341-5400

**FROM:** Richard A. Denton *R. A. Denton*  
CONTRA COSTA WATER DISTRICT  
Tel: (925) 688-8187  
Fax: (925) 688-8142  
Email: rdenton@ccwater.com

**DATE:** December 16, 2004

**PAGES (including cover sheet):** 5

**MESSAGE:**

Please find attached a copy of CCWD's additional comments on the water quality impacts of Delta Cross Channel closures. The original is being mailed to you.

I will also send you a pdf version of this letter by email.

Call when received: YES \_\_\_\_\_ NO  X

**CONTRA COSTA  
WATER DISTRICT**

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December 16, 2004

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Debbie Irvin, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812

**Subject: Additional information on water quality impacts of Delta Cross Channel closures**

Dear Ms. Irvin:

Contra Costa Water District (CCWD) provided verbal comments to the State Water Resources Control Board (SWRCB) on Periodic Review workshop topic #2, Delta Cross Channel (DCC) gates closure, on October 27 and November 15, 2004. CCWD also submitted written comments to the SWRCB on this topic on November 15. CCWD has the following additional comments on the issue of DCC gates closures.

**Water quality degradation can occur even when chloride objectives are being met**

Closure of the DCC under low Delta outflow conditions and high exports results in degradation of water quality at CCWD's intakes. This degradation can impact CCWD's beneficial use of Delta water, even when the municipal and industrial chloride objectives are not exceeded. For example, the water may no longer be of sufficient quality to be diverted to storage and later released from CCWD's Los Vaqueros Reservoir as blending water, or the degradation may require CCWD to release additional blending water.

**DCC should only be closed when there is clear evidence that migrating fish are present**

Closure of the DCC for fisheries protection, for example, during November-January when the DCC may be closed for up to 45 days for fish or flood protection purposes, should only occur when there is clear evidence that migrating fish are present in the vicinity of the DCC. This will avoid situations like the November 1999 DCC closure when Delta water quality was significantly degraded by the DCC closure but only six fish were collected (see, e.g., the presentation by Cliff Schulz, on behalf of the State Water Contractors, on November 15, 2004).

Debbie Irvin, Clerk to the Board

Additional information on water quality impacts of Delta Cross Channel closures

December 16, 2004

Page 2

**Additional actions should be required, when the DCC is closed, to prevent water quality degradation**

The SWRCB should also consider requiring that DCC closures must be accompanied by other actions to prevent water quality degradation. Those actions should be sufficient to ensure closure of the DCC does not degrade Delta water quality (whether or not the M&I objectives are being met). The magnitude of the additional action could be determined through water quality modeling or other means. Note this is analogous to the carriage water that is sometimes assessed by the State Water Project (SWP) and Central Valley Project (CVP) for water transfers to offset water quality degradation.

CCWD supports the current Data Assessment Team (DAT) and Operations and Fish Forum (OFF) processes, part of the CALFED Operations Group process established by the 1994 Bay-Delta Accord. This process allows for adaptive management of the Bay-Delta system with input from fisheries agencies, project operators and stakeholders to best balance the competing needs of fish, drinking water providers like CCWD, and agricultural water users. Use of the Operations Group to provide input on DCC closures is consistent with the May 1995 Water Quality Control Plan and Decision 1641.

However, the winter-run decision tree developed by the DAT only includes water quality triggers to indicate when the DAT should consider reopening the DCC to avoid exceeding the 250 mg/L chloride objective. There is no guarantee the DCC will be reopened and this does not protect CCWD from degradation when the 250 mg/L objective is being met. For example, an increase in chloride concentration at CCWD's Old River intake at Highway 4 from 55 mg/L to 80 mg/L can still significantly affect CCWD's operations and the quality of the drinking water CCWD delivers to its customers.<sup>1</sup> As part of the Periodic Review, the SWRCB should consider setting additional conditions under which the DCC must be reopened, or remain open, to protect water quality.

**No additional days of DCC closures for fish should be allowed unless combined with actions to produce a net improvement in Delta water quality**

The Bay Institute has requested additional days of DCC closure for fish during the November-January period. However, as CCWD has previously noted, the "up to 45 days" requirement for the November-January period, part of the 1994 Bay-Delta Accord, was intended to ensure that the DCC stayed open at least 50% of the time to protect Delta water quality. Similar

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<sup>1</sup> If intake water chlorides rise above CCWD's delivered chloride goal of 65 mg/L, CCWD begins releasing previously stored water in Los Vaqueros Reservoir to blend with Delta water to meet the 65 mg/L goal. This represents a cost to CCWD in terms of water supply, energy costs to replace the stored water, and potential subsequent degradation of CCWD's delivered water if CCWD runs out of blending water. It can also be considered as having the same effect as reducing the effective size of CCWD's \$450 million, 100,000 acre-feet, water quality reservoir, representing a significant loss of a portion of this \$450 million asset.

Debbie Irvin, Clerk to the Board

Additional information on water quality impacts of Delta Cross Channel closures

December 16, 2004

Page 3

requirements were included in Decision 1485 to protect water quality when the DCC was closed.<sup>2</sup>

If additional days of DCC closures for fish were allowed (beyond 45 days), they should only be under high Delta outflow conditions where there is either no change in water quality or accompanied by other actions to produce a net improvement in Delta water quality

#### **Other actions may better protect fish populations than DCC closures**

At the November 15 workshop, the SWRCB asked for information on the effect of DCC closures on the total population of individual endangered and threatened fish species. CCWD does not have new information to provide on fish population but believes that the SWRCB, in attempting to balance competing beneficial uses, should look at other actions, such as Red Bluff Diversion Dam operations and temperature control on upstream tributaries, to see whether these would be more effective for protecting and restoring fish populations. However, consideration of these other actions should avoid impacts on the current beneficial uses of those facilities.

#### **The 45-day closure requirement should be clarified to ensure the DCC is not closed more than 50% of the time, except under high outflow conditions**

The SWRCB should not require more than 45 days of DCC closures during November through January, other than for flood control when Sacramento River flows reach and remain above 20,000 – 25,000 cfs. CCWD requests that the language in the 1995 Water Quality Control Plan be amended to make clear that the SWRCB's intent has always been to require that the DCC remain open at least 50% of the time to protect interior Delta water quality for drinking water and other beneficial uses.

#### **Clarification of Decision Tree Conversion**

In my oral statement to the SWRCB on November 15, 2004, I misspoke when I stated that the winter-run salmon decision tree trigger of 1.8 mmhos/cm EC at Jersey Point was equivalent to 230 mg/L chlorides, 14 days later, at Rock Slough. (Transcript at page 369) I should have said 200 mg/L chlorides.

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<sup>2</sup> In the earlier water rights proceeding that culminated in Decision 1485, the SWRCB imposed operational constraints for the DCC to minimize diversion of young striped bass into the Central Delta. However, in D-1485, DCC closures were limited to periods when Delta outflow was greater than 12,000 cfs, and, for April 16-May 31, limited to no more than two out of four consecutive days (page 39 of D-1485).

Debbie Irvin, Clerk to the Board

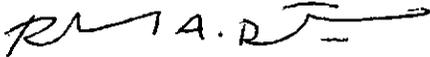
Additional information on water quality impacts of Delta Cross Channel closures

December 16, 2004

Page 4

If you have any question, please contact me at (925) 688-8187.

Sincerely,

A handwritten signature in black ink, appearing to read "R.A. Denton", with a long horizontal flourish extending to the right.

Richard A. Denton

Water Resources Manager

cc: Chester V. Bowling (USBR)  
Alf Brandt (DOI)  
Cathy Crothers (DWR)  
Ken Landau (CVRWQCB)